

DECLARATION

Pursuant to 28 U.S.C. § 1746, I, Helen Butler, declare as follows:

1. I am the Executive Director of the Georgia Coalition for the Peoples' Agenda ("GCPA"). I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.

2. The Georgia Coalition for the Peoples' Agenda ("GCPA") is a Georgia not-for-profit corporation with its principal place of business located in Atlanta, Georgia.

3. The GCPA is a coalition of more than 30 organizations, which collectively have more than 5,000 individual members.

4. The GCPA encourages voter registration and participation, particularly among minority and low-income citizens.

5. The GCPA's support of voting rights is central to its mission. The organization has committed, and continues to commit, time and resources to conducting voter registration drives, voter education, voter ID assistance, Souls to the Polls, and get out the vote efforts in Georgia, such as a "Post the Peach" initiative, to encourage voter turnout.

6. The GCPA has traditionally spent a considerable amount of time and resources directed to voter registration efforts and has conducted voter registration drives throughout Georgia, including in Chatham County.

7. The GCPA registration drives generally occur throughout the year, but increase in number and intensity ahead of voter registration deadlines for general elections. In fact, the GCPA's heaviest voter registration activity typically occurs within the days leading up to the close of voter registration in presidential election cycles.

8. The GCPA typically registers new voters by conducting door to door canvassing, contacting potential registrants in high traffic areas, and by conducting registration events at high schools, community events and at churches.

9. GCPA members had planned to make a final effort to register voters in Chatham County between Friday, October 7, 2016 and Tuesday, October 11, 2016 since these were the final five days before the close of voter registration and included a long holiday weekend when the GCPA hoped to be able to reach a significant number of potential applicants.

10. GCPA, however, was unable to proceed with its planned voter registration activities in Chatham County between October 7, 2016 and October 11, 2016 due to Hurricane Matthew and its aftermath.

11. Due to the mandatory evacuation order in Chatham County and surrounding counties by Governor Deal that was issued on October 6, GCPA

members were unable to conduct any voter registration activity in Chatham County between October 7 and October 9, 2016.

12. Although residents were allowed to begin returning to homes in the County on Sunday evening (October 9), power was still out in many parts of the County, a number of roads were impassible, electrical wires were down and presented a safety hazard and local officials asked that people remain home and off the roads. These conditions would not have allowed canvassers to have safely conducted door to door registration canvassing in Chatham County even after the evacuation order was lifted.

13. As a result, GCPA determined that it could not move forward with its plans to conduct door to door canvassing in Chatham County on October 10 or 11, 2016.

14. The Chatham County Board of Elections office was also closed between October 7 and 11, 2016, which would have made it impossible for canvassers to hand deliver applications to the Board, even if canvassers were able to collect applications during this time frame.

15. Due to Hurricane Matthew and its aftermath, the GCPA respectfully requests that the Court extend the voter registration deadline for residents of Chatham County for the number of business days when the Chatham County Board of Elections was closed between October 6 and October 11, 2016, so

that Chatham County residents are given the same opportunity to register to vote as residents in other parts of the state who were not impacted by Hurricane Matthew.

16. I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of October 2016, at Atlanta, Georgia.

A handwritten signature in black ink, appearing to read 'Helen Butler', written in a cursive style.

Helen Butler